

## REMARKS

In the Final Office Action, the Examiner allowed claims 10-16 and 18-19, but rejected claims 1-2, 5-8, 20-21, and 23-26 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,130,751 to Sato (hereinafter “Sato”). The Examiner also rejected claims 3 and 4 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of U.S. Patent No. 6,775,498 to Palumbo (hereinafter “Palumbo”). Applicants respectfully traverse the rejections.

### **35 U.S.C. §102(b) Rejections**

The Examiner rejected claim 1 under 35 U.S.C. §102(b) as being anticipated by Sato. Claim 1 is directed to an image forming apparatus that includes an electrical connector assembly associated with a photoconductive member. The electrical connector assembly is operative to “bias said photoconductive member to an operating voltage without biasing said shaft to said operating voltage.” The reference to Sato does not disclose this limitation.

As seen in Figure 1 of Sato, a shaft (6) supports a rotary drum (8). A pair of wires (67) electrically connects a power source to an electric heating means (16) disposed within the drum. According to Sato, electric heating means are well known to prevent the formation of dew on the surface of the rotary drum. *Sato*, col. 1, ll. 49-54. Thus, any electrical connections or alleged “electrical connector assemblies” disclosed in Sato provide power to the drum interior to specifically address humidity issues. That is, they keep the drum dry - they do not bias the drum to an operating voltage.

Biasing a photoconductive drum to an operating voltage is different from heating a photoconductive drum to prevent moisture buildup. When biased to an operating voltage, a photoconductive drum attracts toner particles that are subsequently transferred to print media. However, heating the drum does not cause the drum to attract toner particles. It simply warms

the drum. There is no indication in Sato that the current to the heating means does anything other than heat the drum to prevent moisture buildup.

Moreover, according to Sato, the alleged electrical connector assembly is not operative to bias the drum to an operating voltage. Particularly, Sato teaches electrically connecting the drum to the image forming apparatus via an electrically conductive support shaft to ground the drum. *Sato*, col. 13, ll. 22-39. Grounding the drum as disclosed by Sato would necessarily prevent the drum from reaching an operating voltage. Thus, the alleged electrical connector assembly cannot be operative to bias the drum to an operating voltage.

Sato simply does not teach the requisite electrical connector assembly operative to bias a photoconductive drum to an operating voltage without biasing the shaft to the operating voltage. Therefore, Sato does not anticipate claim 1 or any of its dependent claims under §102.

The Examiner also rejected claims 5 and 20, both of which are directed to a photoconductive member for an image forming apparatus, under 35 U.S.C. §102(b) as being anticipated by Sato. Claim 5 recites, “an electrical contact assembly operative to bias said drum, but not said shaft, to an operating voltage.” Claim 20 recites, “an electrical contact operative to bias said cylindrical member to an operating voltage by contact with the interior surface of said cylindrical member.” The electrical contact assembly of claim 5 and the electrical contact of claim 20 are electrically isolated from the shaft by an insulating end cap. For reasons similar to those stated above, Sato does not disclose these limitations of claim 5 or claim 20. Accordingly, Sato does not anticipate claim 5 or claim 20, or any of their respective dependent claims under §102.

The Examiner also rejected claim 25 under 35 U.S.C. §102(b) as being anticipated by Sato. Claim 25 is a method claim that recites, “biasing said cylindrical member to said operating voltage by electrically connecting an electrical contact to the interior surface of said hollow cylindrical member while interposing an insulating wall at least partly between said electrical contact and said shaft.” For reasons similar to those stated above, however, Sato fails to

disclose this limitation. Therefore, Sato cannot anticipate claim 25 or any of its dependent claims under §102.

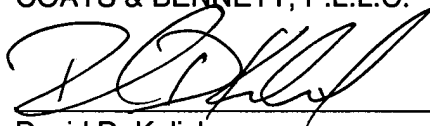
**35 U.S.C. §103(a) Rejections**

The Examiner also rejected claims 3 and 4 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of Palumbo. However, both claims 3 and 4 depend directly or indirectly from independent claim 1. Because claim 1 is patentable over Sato, the §103 rejection of its dependent claims 3 and 4 necessarily fails.

In light of forgoing remarks, all pending claims are patentable over the cited art. As such, Applicants respectfully request the allowance of all pending claims.

Dated: January 17, 2006

Respectfully submitted,  
COATS & BENNETT, P.L.L.C.



David D. Kalish  
Registration No.: 42,706

P.O. Box 5  
Raleigh, NC 27602  
Telephone: (919) 854-1844  
Facsimile: (919) 854-2084